

# EXHIBIT C



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March 23, 2004

**BY FACSIMILE**

Eric C. Holzapfel, Esq.  
Wood & Lamping, LLP  
600 Vine Street, Suite 2500  
Cincinnati, OH 45202

**Re: *Travelodge Hotels, Inc. v. Govan, et al.***  
**United States District Court, Southern District of Ohio, Western Division**  
**Case No. C-1-01-784**

Dear Mr. Holzapfel:

This letter will respond to your letter dated March 23, 2004, in which you set forth your objections to the subpoena which we recently served in order to obtain copies of your firm's billing records in this case.

First, I can assure you that the reasons given by Nancy Oliver for our request for an extension of time to respond to your objections was, in fact, based upon her pre-planned vacation all this week. The subpoena for documents would have been issued in any event.

Second, although your firm represented your client against two parties in this action, much of the work on this case involved both parties and your firm's records of time expended on various tasks is clearly relevant to your claims that our firm's expenditure of time on those same tasks was excessive. Since you have offered your personal opinion as to the reasonableness of time expended by my firm in successfully representing our client as part of Govan's objections, you have put your credibility at issue.

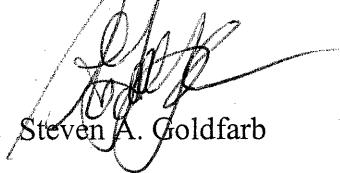
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For these reasons, the objections which you set forth to the subpoena are without merit and in bad faith. If you do not communicate your firm's willingness to produce documents in response to the subpoena by the close of business tomorrow, we will immediately file an appropriate motion with the Court.

Very truly yours,



Steven A. Goldfarb

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cc: Nancy A. Oliver, Esq.